

United States District Court Western District

Peter Seymour

Plaintiff,

v.

Georgia Kostchyz, et al.,
Defendants

Amended Complaint

22-cv-170-jdp

1. I would like all of the original complaint kept. I would like to include the following.
2. On 5-18-17 John/Jane Doe scheduled an appointment with Dr. Martin for the end of the month. This appointment was canceled/re-scheduled.
3. On 6-5-17 John/Jane Doe scheduled an appointment. This appointment was canceled/re-scheduled.
4. On 7-18-17 John/Jane Doe scheduled an appointment. This appointment was canceled/re-scheduled.
5. In August, 17th the unit manager of oxbow called Hsu about Mr. Seymour's knee twice. Once in early August and again in mid August. Two appointments were set up both canceled & re-scheduled.

Argument

6. John/Jane Doe was responsible for scheduling, re-scheduling and keeping of appointments. Therefore John/Jane Doe was not only negligent but also violated Mr. Seymour's right to care for serious medical need under 8th amendment. John/Jane Doe was made aware through multiple request slips that Mr. Seymour was in pain. Also the fact that when Mr. Seymour was finally seen Oct 13 2017 (see exhibit H) and significant quad atrophy was noted explains clearly that any person could tell that something was wrong with Mr. Seymour's leg/knee. This progression of pain and shrinking of the muscle may have not progressed if the delay in treatment wasn't there.

7. This amended complaint includes 14 exhibits lettered A-N to support both the complaint and amended Complaint.

Dated this 28th day of November 2022

Pursuant to 28 U.S.C § 1746, I declare under penalty of perjury that the facts stated herein are true and correct and based on personal observations and direct knowledge.

Respectfully Submitted

Peter Seymour #426491

Peter Seymour

RG CI

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